

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:

ANGELA MCLEOD-COOPER

Debtor

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Case No. 10-13456-DWK

(Chapter 13)

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OBJECTION TO CONFIRMATION OF PLAN

Ellen W. Cosby, Trustee, having reviewed the Chapter 13 statement and plan filed in this case, having examined the Debtor at the Section 341 meeting, and having reviewed any additional information and documentation deemed pertinent, objects to confirmation of the Debtor's Plan filed February 2, 2010 for the reasons stated below.

OUTSTANDING ITEMS FROM PRIOR OBJECTION:

1. There are not enough funds to satisfy secured debt arrears and no funds for unsecured claims.
2. The Debtor has not properly addressed the payment of the secured debt owed Baltimore County, Maryland under Paragraph 2(e)(iii) of the Plan with an appropriate discount rate.
3. The Equal Monthly Payment (EMP) stated in Paragraph 2(e)(ii) of the Plan is less than the \$15.00 per month minimum stated in Federal Bankruptcy Rule 3010(b).

NEW OBJECTIONS:

4. The calculation for repayment of secured debt arrearages in Paragraph 2(e)(ii) of the Plan conflicts with the payment of the outstanding attorney's fee stated in Paragraph 2(b).
5. The plan fails to provide for payment of the \$42,231.34 secured arrears claim filed by Washington Mutual /Deutsche Bank National Trust Company.
6. The Debtor has failed to file the required Pre-Confirmation Certification.

Dated: April 20, 2010

/s/ Ellen W. Cosby
Ellen W. Cosby
300 E. Joppa Road, #409
Baltimore, MD 21286
(410) 825-5923
inquiries@ch13balt.com
Chapter 13 Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Objection was transmitted electronically through CM/ECF to Adam M. Freiman, Esquire, attorney for the Debtor and was mailed by first-class mail on April 20, 2010 to the Debtor.

Angela McLeod-Cooper
1808 Alto Vista Avenue
Gwynn Oak, MD 21207

/s/ Ellen W. Cosby
Ellen W. Cosby